

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO ADVO INTERROGATORIES
(ADVO/USPS-T13-128, 131, 132, 135, 140-147)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-128, 131, 132, 135, filed on March 30, 2000, and 140-147, filed on April 20, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 25, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. FOLLOW-UP INTERROGATORIES**

ADVO/USPS-T13-128. In response to MPA/USPS-T13-67(c), you state that "The T05 code [walking] was used when the carrier was walking other than the other defined codes." The other Activity codes were T01 Travel to First Delivery Point, T02 Travel b/t Delivery, and T03 Travel b/t w/Sort.

(a) Please confirm that there are walking code (T05) tallies at both On Route (L13) and Point of Delivery (L12) locations, If you cannot, please explain why not.

(b) Among a set of park & loop deliveries within one loop, under what typical circumstances do you believe your data collectors may have scanned the T05 code? If you cannot identify the typical circumstances, please explain fully why not.

(c) On a dismount delivery, under what typical circumstances do you believe your data collectors may have scanned the T05 code? If you cannot identify the typical circumstances, please explain fully why not.

(d) On a set of foot deliveries within one relay, under what typical circumstances do you believe your data collectors may have scanned the T05? If you cannot identify the typical circumstances, please explain fully why not.

(e) On a central delivery, under what typical circumstances do you believe your data collectors may have scanned the T05 code? If you cannot identify the typical circumstances, please explain fully why not.

RESPONSE:

(a) Confirmed, there are 149 (of 39,046 total tallies in LR-I-163) T05 Walking tallies at Level 10, On Route (L13) locations and 5 (of 39,046 total tallies) T05 Walking tallies at Level 10, Point of Delivery (L12) locations.

(b-e) In an attempt to expand on my response to MPA/USPS-T13-67 (c), the T05 code may have been scanned under the following typical circumstances, including but not limited to:

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- Carrier is walking, specifically dead head walking, where the intent of the carrier is to return to the vehicle or another location, and/or
- The carrier is not traveling to the first delivery point, or not returning to the unit, and has deviated from the route and ends up taking PBL time, and/or
- The observer could see that the carrier was not sorting mail, or had no mail in hand to sort, and is not preparing to deliver and is not walking in the direction to reach the next delivery point, and/or
- The observer could not anticipate if the carrier was, in fact walking to the next delivery point. This situation may occur if the carrier carries some portion of the route in a sequence other than the USPS Form 3999x indicates. Therefore, the observer may not be able to determine if the carrier's walk destination is a delivery.

These circumstances apply for one loop within a set of Park and Loop deliveries (32 of the 39,046 total tallies, note there is no way to determine from the work sampling tallies when the loop began or ended.) These circumstances apply for dismount deliveries (102 of the 39,046 total tallies). These circumstances apply for foot deliveries (2 of 39,046 total tallies). These circumstances also apply for central deliveries (36 of 39,046 total tallies).

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ADVO/USPS-T13-131. Please refer to your response to MPA/USPS-T13-94 where you state that you cannot, without specific records, explain why virtually all the Code G activity detail (e.g., public relations, service rates, directions, excess words) were allocated to the STS Load category.

(a) Please confirm that when a Code G Activity Detail was scanned, that does not necessarily mean that the carrier, at that instant, was physically handling mail, a mail satchel/container (other than physically carrying it), or a mail form.

(b) Please confirm that the Activity code associated with a Code G Activity Detail (such as Activity Code F04 "Delay Specify"), does not provide any additional information to determine whether the carrier was physically handling mail, a mail satchel/container (other than physically carrying it), or a mail form.

(c) Please confirm that a Code G Activity Detail can occur at many different Locations, and not just at Point of Delivery.

RESPONSE:

(a) Confirmed. The G Activity Detail codes, by themselves, are not intended to capture what specific physical action the carrier is performing, whether physically handling mail, a mail satchel/container (other than physically carrying it), or a mail form. By and large however, use of these codes in combination with other Levels of codes (Level 11.1, 11.2, 11.3, and 11.4) may indicate physical movement and may yield additional insight into what carrier activity is taking place.

(b) Confirmed, if by "Activity code associated with a Code G Activity Detail" you mean F Activity Codes. In these cases, F Activity codes will not and are not intended to provide additional information as to whether the carrier was physically handling mail, a mail satchel/container (other than physically carrying it), or a mail form. However, use of the F Activity Codes in combination with other

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Levels of codes (Level 11.1, 11.2, 11.3, and 11.4) may indicate physical movement and may yield additional insight into what carrier activity is taking place.

- (c) Confirmed. Based on the 39,046 tallies in LR-I-163 presented to witness Baron, Code G Activity Detail occurred at many different Locations including: point of delivery (L12), 67 tallies; Vehicle (L08), 20 tallies; On route (L13) 13 tallies; Misc. (L15), 4 tallies; In vehicle Stopped (L19), 2 tallies; and Dock (I07), 1 tally.

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ADVO/USPS-T13-132. In response to MPA/USPS-T13-57 (b), 61(b), 64(b), and 67(f), questions regarding the systematic efforts made to ensure that the codes were consistently and correctly applied by all data collectors, you state that "USPS Subject Matter Experts and the roving quality assurance personnel would spot check the observations. The work sampling scans were cross-checked with the time study records, observer comments and video tapes."

- (a) Please describe the qualifications of a roving quality assurance person and state whether such a person was a Resource & Process metrics, Inc. employee, an employee of another consulting firm, or a USPS employee.
- (b) Were USPS Subject Matter Experts and roving quality assurance personnel used in both Phases 1 and 2? Please explain and provide the number of such experts and number of quality assurance personnel in Phases 1 and 2, separately.
- (c) Was some portion of each route-day observed by a USPS Subject Matter Expert and a roving quality assurance person? If not, please identify the route-days for which a portion of time was observed by either a USPS Subject Matter Expert or roving quality assurance person.
- (d) Typically, when observed, how much of a route-day was observed by a USPS Subject Matter Expert or roving quality assurance person?
- (e) Was some portion of each route-day cross-checked with the time study records, observer comments and video tapes? If not, please identify the route-days that were cross-checked by each method.
- (f) Were the cross-checks performed by both the USPS Subject Matter Experts and roving quality assurance personnel? If not, who performed the cross-checks?
- (g) Typically, how much of a route-day was cross-checked by a USPS Subject Matter Expert, roving quality assurance person, or some other person?
- (h) Were you a roving quality assurance person and did you personally cross-check any of the time study records, observer comments and video tapes?

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RESPONSE:

- (a) There are no specified, documented qualifications of a roving quality assurance person. All Phase 2 quality assurance individuals had been data collectors in Phase 1. One individual was a Resource and Process Metrics, Inc. employee who served in the capacity of quality assurance, but did perform other duties on rare occasions, on an as-needed basis. The other 2 roving quality assurance individuals were independent contractors under contract with Resource and Process Metrics, Inc.
- (b) Yes. There were three Subject Matter Experts rotating between teams in Phase 1. Phase 2 included 1 Subject Matter Expert and 3 roving quality assurance personnel, 1 of whom did perform other duties as necessary. Refer to responses to ADVO/USPS-T13-6(c) and ADVO/USPS-T-13-30(c) regarding Subject Matter Expert and quality assurance personnel participation in Phases 1 and 2.
- (c) No. A portion of each route-day was not observed by USPS Subject Matter Expert or roving quality assurance person. Unless some other circumstance dictated otherwise, the USPS Subject Matter Experts and/or roving quality assurance individuals were committed to the quality assurance function. Therefore, for each day worked by a USPS Subject Matter Expert and/or roving quality assurance person, some portion, if not all of the route day was observed. The following list, based on LR-I-163, is not inclusive of all route-days for which a portion of time was observed by either a USPS Subject Matter Expert and/or roving quality assurance

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person. Since records were not maintained as to the frequency of checks, when compiling the following list, we focused our effort primarily on the Field Edited Data Collected binders/paperwork for indications that a quality assurance person was present. Please note that there are more route-days (that quality assurance personnel were present) than we are able to substantiate. The quality assurance personnel, however, were committed to the quality assurance function and spent a vast majority of time in the field rather than performing other activities that would have taken them away from quality assurance functions. The requested route days are presented below, and in library reference LR-I-390.

Route	Date
0102	15-May-97
0102	16-May-97
0102	12-Jan-98
0105	08-May-97
0105	09-May-97
0110	06-Feb-98
0113	05-Feb-98
0115	20-Dec-97
0124	07-Jan-98
0126	08-Jan-98
0129	12-Nov-97
0164	05-May-97
0164	06-May-97
0164	07-May-97
0240	29-Jan-98
0244	16-Dec-97
0248	10-Jan-98
0249	15-Dec-97
0252	06-Jan-98
0281	13-Jan-98
0310	06-Dec-96
0326	04-Dec-96

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0371	04-Feb-98
0374	17-Dec-97
0376	09-Jan-98
0379	12-Jan-98
0384	18-Dec-97
0405	23-Jun-97
0405	24-Jun-97
0405	25-Jun-97
0411	19-May-97
0424	05-Aug-97
0424	06-Aug-97
0426	07-Aug-97
0426	08-Aug-97
0432	28-May-97
0474	29-May-97
0474	30-May-97
0480	05-Dec-96
0610	11-Feb-97
0626	13-Feb-97
0628	12-Feb-97
0716	13-May-97
0716	14-May-97
0807	04-Sep-97
0807	05-Sep-97
0818	06-Jan-97
0825	12-Aug-97
0825	13-Aug-97
0825	14-Aug-97
0825	15-Aug-97
0828	07-Jan-97
0828	02-Sep-97
0828	03-Sep-97
0849	08-Jan-97
0908	14-Dec-96
1101	03-Jun-97
1101	04-Jun-97
1131	09-Jun-97
1131	10-Jun-97
1132	19-Aug-97
1132	20-Aug-97
1132	21-Aug-97
1132	22-Aug-97
1132	23-Aug-97
1133	06-May-97
1133	07-May-97
1133	08-May-97

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1133	13-May-97
1133	14-May-97
1133	16-May-97
1145	15-Jul-97
1145	16-Jul-97
1145	17-Jul-97
1148	02-Jun-97
1148	02-Jun-97
1205	16-Dec-96
1206	17-Dec-96
1233	13-Nov-96
1237	14-Nov-96
1252	18-Nov-96
1401	12-Aug-97
1401	13-Aug-97
1411	07-May-97
1411	07-May-97
1411	08-May-97
1411	09-May-97
1411	10-May-97
1428	09-Jan-97
1430	10-Jan-97
1435	11-Jan-97
1475	01-Jul-97
1475	03-Jul-97
1507	26-Aug-97
1507	27-Aug-97
1507	28-Aug-97
1507	29-Aug-97
1579	05-May-97
1579	06-May-97
1579	07-May-97
1579	19-May-97
1579	20-May-97
1579	21-May-97
1581	11-Jun-97
1581	16-Jun-97
1581	17-Jun-97
1581	18-Jun-97
1581	19-Jun-97
1605	09-Jun-97
1605	10-Jun-97
1605	11-Jun-97
1606	12-Jun-97
1612	10-Dec-96
1618	11-Dec-96

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1620	17-Oct-96
1620	17-Oct-96
1632	16-Oct-96
1638	15-Oct-96
1842	09-Dec-96
1901	08-Jul-97
1901	09-Jul-97
1908	06-Nov-96
1917	10-Jul-97
1926	07-Nov-96
1928	05-Nov-96
1946	13-Feb-97
2160	22-Oct-96
2167	23-Oct-96
2167	23-Oct-96
2169	24-Oct-96
2169	24-Oct-96
2205	03-Nov-97
2210	05-Nov-97
2212	04-Nov-97
2213	06-Nov-97
2214	24-Jun-97
2214	25-Jun-97
2214	07-Nov-97
2215	27-Jun-97
2374	13-Jan-97
2375	15-Jan-97
2385	14-Jan-97
2451	29-Oct-96
2451	29-Oct-96
2465	30-Oct-96
2469	28-Oct-96
2469	28-Oct-96
2806	23-Oct-96
2814	24-Oct-96
2822	22-Oct-96
2835	21-Oct-96
2912	05-Feb-97
2934	14-Nov-96
2947	04-Feb-97
3104	04-Dec-96
3125	03-Dec-96
3141	05-Dec-96
3549	06-Jan-97
3618	09-Jan-97
3656	08-Jan-97

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3703	06-Nov-96
3706	06-Feb-97
3707	05-Feb-97
3707	08-Jul-97
4214	29-Jan-98
4229	05-Feb-98
4234	28-Jul-97
4234	30-Jul-97
4234	30-Jul-97
4234	20-Aug-97
4235	30-Jan-98
4241	31-Jan-98
4242	04-Feb-98
4243	30-Jun-97
4243	01-Jul-97
4243	02-Jul-97
4254	11-Sep-97
4273	24-Jul-97
4273	25-Jul-97
4275	22-Jul-97
4275	23-Jul-97
4310	11-Jan-97
4442	15-Jan-97
4506	07-Jan-97
4515	13-Jan-97
4708	25-Oct-96
4712	15-Oct-96
4719	30-Oct-96
4725	24-Oct-96
4731	22-Oct-96
4732	17-Oct-96
4811	16-Oct-96
4814	29-Oct-96
4817	26-Oct-96
4846	18-Nov-96
4880	19-Nov-96
4910	23-Oct-96
4916	22-Oct-97
4917	21-Oct-97
4921	28-Oct-96
4926	23-Oct-97
4940	09-Oct-97
4945	07-Oct-97
6410	27-May-97
6410	28-May-97
6419	29-May-97

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6703	10-Dec-96
6739	11-Dec-96
6742	09-Dec-96
8008	13-Dec-96
8028	17-Oct-96
8035	15-Oct-96
8044	17-Dec-96
8045	16-Oct-96
8212	15-Jul-97
8212	16-Jul-97
8218	21-Jul-97
8218	22-Jul-97
8218	23-Jul-97
8229	16-Dec-96
8701	05-Jun-97
8701	06-Jun-97
8701	08-Nov-97
8702	25-Oct-97
8702	12-Nov-97
8711	01-Nov-97
8717	08-May-97
8717	09-May-97
8717	29-May-97
8726	23-Oct-97
8727	27-Oct-97
8729	31-Oct-97
8735	10-Jul-97
8735	11-Jul-97
8735	12-Jul-97
8735	14-Jul-97
8735	15-Jul-97
8735	16-Jul-97
8735	17-Jul-97
8735	24-Jul-97
8735	25-Jul-97
8735	07-Nov-97
8736	24-Oct-97
8744	25-Aug-97
8744	26-Aug-97
8744	27-Aug-97
8744	28-Aug-97
8744	02-Sep-97
8744	03-Sep-97
8744	04-Sep-97
8744	05-Sep-97
8744	06-Nov-97

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8747	30-Oct-97
8759	05-Aug-97
8759	06-Aug-97
8759	07-Aug-97
8759	08-Aug-97
9302	28-Oct-96

- (d) The quantity of time of a USPS Subject Matter Expert or roving quality assurance person spent observing a route varied up to and including the entire day; there are no records indicating the amount of time observed. Unless schedule conflicts arose (e.g., travel/flight plans), the Subject Matter Expert or quality assurance individual would attempt to observe the entire route day and spot check work sampling and time study reports printed by the data collectors.
- (e) No records were maintained on the frequency and methodology of checks; therefore, it is not possible to identify the route-days that were cross-checked by various methods.
- (f) To the extent that cross-checks were performed, the cross-checks may have been performed by one of the observers, the Subject Matter Expert, the Quality Assurance person, or any other individual associated with the project that may have been present.
- (g) No records were maintained identifying what portions of the route-days were cross-checked by whom. It was a daily function of the data collectors, Subject Matter Expert, roving quality assurance person, or other individual associated with the project who was in the field to cross-check daily reports for accuracy of barcode scans. Specifically, the work-

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sampling reports span the day of the carrier, from the time the carrier clocks in for the day up to and including the carrier clocking out at the end of the day. Therefore, the time span of the work sampling report covers the route-day. Consequently, when daily reports are cross-checked, the route-day is cross-checked.

(h) No.

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ADVO/USPS-T13-135. In view of the disparity in the Locations and Activities by STS category between (i) your Appendix F, and (ii) both the LR I-163 database as shown in Advo Interrogatories 133-134 and the tally types listed in MPA/USPS-T13-86 and 99 [which you say you cannot respond to without specific tally references], please respond to the following:

(a) At page 14 of your testimony, you discuss the process by which you assigned STS categories to the observations in the database, beginning with a line-by-line manual assignment. At page 14 (lines 18-20) you then state:

"To crosscheck the manual review process, a master list was created of scan sequences. The sequences were grouped according to STS activity. All scan sequence possibilities for an STS activity were assigned a 1-6 code."

Is your Appendix F, in fact, the "master list" of scan sequences, as you claimed in your response to ADVO/USPS-T13-22(d)?

(b) We have not been able to replicate either a "master list" of scan sequences or your Appendix F. Explain precisely, in a step-by-step manner sufficiently detailed to allow other parties to follow and replicate your results, how you created this "master list" of scan sequences "grouped according to STS activity."

(c) What was the source for creation of the "master list" of scan sequences? If it was something other than the database developed in the initial manual review process, please provide the source materials in their entirety, and explain how those source materials were used to create the "master list."

(d) Please provide a copy of the "master list" created by the process described in subparts (b) and (c) above. If you claim that Appendix F is the "master list," please explain how Appendix F was created so that other parties might replicate it.

(e) With respect to your use of the "master file" to "crosscheck the manual review process" (Testimony at page 14, line 18) Webster's Third New International Dictionary defines "cross-check" as "to check (as data, reports, statements) from various angles or sources to determine accuracy or validity." Is your use of the term "crosscheck" consistent with this definition?

(1) If so, explain why.

(2) If not, please explain more precisely what you meant by the term "crosscheck."

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(f) Please state whether or not the "crosscheck" procedure you describe checked the database developed in the manual sequence review step "to determine accuracy or validity" of the manual STS entries. If your answer is anything other than "No,"

(1) Please explain precisely how your crosscheck procedure checked the accuracy or validity of either the observed database entries or the manual STS entries.

(2) Please identify each and every record or tally in LR I-163 where the "crosscheck" procedure resulted in either (i) a change in the STS category assigned to the tally or (ii) a change in the other observer-recorded fields of the tally. For each such change, please provide the original information before the change, and explain why the change was made.

(g) In your testimony, from page 14 line 20 through page 15 line 2, you state that after creation of the "master list" of scan sequences:

"An update query was then used to assign the sequences a code in the database. These codes appear in the Library Reference USPS-LR-I-163 with the column header 'STS Type.' "

(1) Please confirm that this quoted statement is inconsistent with your statement at page 14, lines 16-17, that "The column 'STS Type' contains definitions entered by manual sequence review."

(2) Please confirm that the codes you refer to at page 15 are numeric codes, not text fields.

(3) Please confirm that these numeric codes appear in LR I-163 under the column header "File," not under the column header "STS Type."

(4) Please confirm that the information in the LR I-163 database under the column header "STS Type" consists of the STS category entries "entered by manual sequence review" described at page 14, lines 13-16. If you do not confirm,

(i) Please identify each and every record or tally in LR I-163 where the actual STS category shown in the "STS Type" field differs from the STS category that was manually entered in the initial "manual sequence review."

(ii) For each such record, please provide the STS type that was initially entered manually, and the different STS type that appears in LR I-163.

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(iii) For each such record, please explain at what point in the process described at pages 14-15 the STS type was changed, the reason for the change, and the methodology by which it was changed.

If you cannot confirm any of (1)-(4) above, please explain fully why not, including an explanation of the correct meaning and content of the "File" and "STS Type" column headers, and the source and derivation of the STS-related information contained in those fields.

(h) At page 14 line 19 through page 15 line 2, you state that after the "master list" of scan sequences was created,

"All scan sequence possibilities for an STS activity were assigned a I-6 code. An update query was then used to assign the sequences a code in the database. These codes appear in the Library Reference USPS-LR-I-163 with the column header 'STS Type.' "

Please respond to the following with respect to this "update query."

(1) Provide and describe the full Microsoft Access@ query or queries that you actually used.

(2) What information does the "update query" actually update? Please be specific, and provide examples of the results of the "update query" process.

(3) Explain precisely, in a step-by-step manner sufficiently detailed to allow other parties to follow and replicate your results, how you created this update query, what the update query does, and how it is executed.

(4) Was the "update query" designed or intended to either flag for review, check the accuracy, or change in any manner (i) any of the observer-entered data in the database, or (ii) any of the manual STS assignments made during the initial "manual sequence review?" If so,

(i) Please explain how the update query flags for review, checks for accuracy, or changes the database information in any manner.

(ii) Please identify each and every record in LR I-163 where, as a result of the "update query" process, the actual STS category shown in the "STS Type" field was changed from the STS category that was manually entered in the initial "manual sequence review," and for each such record provide the original manually-entered STS type.

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(iii) Please identify each and every record in LR I-163 where, as a result of the "update query" process, changes were made to any of the observer-entered information, and for each such record provide the original observer-entered information.

(i) Please explain, on a step-by-step basis, precisely how a party, working with the collected tally information contained in all but the last two fields of the LR I-193 database ("File" and "STS Type"), can replicate your assignments of tallies to the various STS categories. For each step,

(1) Please provide (and explain in plain language) all programs, formulas, queries, algorithms, etc. that are used in that step of the replication,

(2) Please explain the rationale or logic underlying such programs, etc.

(3) Please explain precisely how a party would apply and execute the programs to reproduce your STS assignment results.

(j) Please refer to the following:

- Subparts (a)-(i) of this interrogatory and your responses thereto, and
- Your "responses" to MPA Interrogatories MPANSPS-T13-83, 85-90, 93, 94, 96, 97, 99-101, 106 and 108, where you state that you cannot respond to questions concerning the interpretation and STS classification of types of tallies or even hypothetical questions "without references to the specific records in question, including CY code, route ID, date, etc."

Is your inability to address questions about the STS classification of types of tallies without references to the specific tallies related in any manner to the possibility that the actual STS Type entries in LR I-163 are, in the case of each of the 39,046 records, the result of the manual, line-by-line assignment described in your testimony at page 14, lines 13-17? Please explain.

RESPONSE

(a) Not exactly. In my response to ADVO/USPS-T13-22 (d), I state "Please refer to Appendix D and Appendix F of my testimony." In fact, Appendix D contains a master list of all codes used in creating a scan sequence. All codes found in an individual tally or tally group can be found in Appendix D.

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- (b) At page 14 of my testimony, I was referring loosely to Appendices D and F as the master list that I used in reviewing STS categories assignments. Obviously, based on my response to ADVO/USPS-T13-133 and ADVO/USPS-T13-134, very few of the descriptions used in level 10 and level 11.4 were omitted from Appendix F. Please refer to ADVO/USPS-T13-133 and ADVO/USPS-T13-134 for the explanation of the missing descriptions.
- (c) LR-I-163 was the source for the development of Appendix D and Appendix F.
- (d) Although I was referring loosely to Appendices D and F, I have provided more comprehensive listings of scanned sequences. Please refer to the response to Presiding Officer's Information Request (POIR) No. 8 and to LR-I-281. See also LR-I-383, to be filed shortly.
- (e) (1) Yes. Please refer to my response in ADVO/USPS-T13-135 (f) (1).
- (f) The "crosscheck" was an attempt to determine the accuracy of the assignment of the STS categories.
- (1) I printed the frequency distribution grouped by the STS categories similar to the frequency distribution provided in LR-I-281. Then visually scanned the printout for adherence to the STS definitions.
- (2) Please refer to the response to Presiding Officer's Information Request (POIR) No. 8 and to LR-I-281. See also LR-I-383, to be filed shortly.
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- (g) (1) Confirmed. Line 2 of page 15 the "column header STS Type" is incorrect. This statement should read starting at line 1 'These codes appear in the Library Reference USPS-LR-I-163 with the column heading "File".
- (2) Confirmed. Please refer to my response to ADVO/USPS-T13-135 (1).
- (3) Confirmed. Please refer to my response to ADVO/USPS-T13-135 (1).
- (4) (i) In general, any tally with a frequency of occurrence in LR-I-221 of approximately 3 or less was manually assigned the STS category. It does not make sense to run the update query on such low frequency tallies.
- (ii) No data is available.
- (iii) Please refer to the response to Presiding Officer's Information Request (POIR) No. 8 and to LR-I-281. See also LR-I-383, to be filed shortly.
- (h) (1) The Access query is provided in LR-I-388, a zip file called ADVO135.zip.
- (2) The Access update query updates the column called "File" in LR-I-163 with the number related to the STS category. An example of the results are the records in LR-I-163.
- (3) Left click on the tab in Access that shows "Queries". Select the "New" button. Choose "Simple Query Wizard" from the list on the screen and left click on the "OK" button. Select the table containing the tally data by using the left mouse button. Choose all columns in the data table by clicking on the ">>" that is on the screen. Choose the "Next>" button and press the left

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click button. Left click the "Next>" button that appears on the screen. Left click on the "Modify the query design" option button and left click the "Finish" button. From the list of query type that is available from the icon at the top of the screen, choose "update query" with the left button on the mouse. In the "criteria" line on the update query enter the level 10 through level 11.4.1 codes that correspond to the unique group of tallies that you want to update. In the line on the query "Update to" enter the "File" number and "STS Type" name of the tallies to be updated. Then left click on the exclamation point icon at the top of the screen to execute the update query. Access will display a message as to the number of records that have been updated. Left click on the "OK" button to verify the update.

(4) No, the update query was not designed to or intended to change any of the observation data.

- (i) The data table is only changed in the columns specified in the "Update to" line in the update query.
 - (ii) No information is available.
 - (iii) No changes were made in the observer-entered information by the update query.
- (i) You state "LR-I-193", I am not familiar with this library reference. If you are referring to LR-I-163, I can provide the following information.
- (1-3) STS assignments were made on a case by case basis. Please refer to the response to Presiding Officer's Information Request (POIR) No. 8 and to LR-I-281. See also LR-I-383, to be filed shortly.

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(j) Not exactly. As previously stated, in general the tallies with a low frequency of occurrence were updated manually. The tallies with a greater number of occurrences were updated using the update query.

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ADVO/USPS-T13-140. In your response to ADVO/USPS-T13-75, you state that an "Arrow" key is required to open a group of central boxes. In response to MPA/USPS-T13-66, you state that "deliveries that were classified as Central required the carrier to exit the vehicle." In response to ADVO/USPS-T13-78, you state that a "drop to customer" receptacle code is used when the carrier drops mail to a central mailroom.

- (a) Can one assume that if the carrier was loading either an NDCBU or a Central Box with an Arrow key, the Delivery Type could be either "Central" or "Dismount" but the receptacle code associated with that type of delivery should be either "central outside" or "central inside?" Please explain.
- (b) Would an NDCBU or Central receptacle requiring an "Arrow" key always be identified as either a "central outside" or "central inside" activity detail? If not, what other receptacle codes could be involved? Please explain.
- (c) If a tally indicates a "Central" delivery type with a delivery/collect activity code and a "drop to customer" activity detail code, can such a tally be assumed to be a routine delivery (i.e., not associated with accountable/parcel/ hardship service) to a multiple-address delivery point? Please explain.
- (d) If a tally indicates a "Dismount" delivery type with a delivery/collect activity code and a "drop to customer" activity detail code, can the tally be assumed to represent a routine delivery (i.e., not associated with accountable/parcel/hardship service)? Please explain.
- (e) With respect to the "drop to customer" code associated with a dismount delivery, was this code used only when the carrier was physically handing the mail to the customer or physically placing it on the customer's counter/reception space (i.e., it was not used by an observer to indicate that the carrier was moving from a routine delivery point to a non-routine drop point)?
- (f) Please confirm that a "drop to customer" activity detail code on a foot, curb, dismount or park & loop delivery type can occur at either a single or a multiple address delivery. If that is incorrect, please explain fully.
- (g) For tallies indicating "drop to customer" activity detail, regardless of the activity code associated with it, please confirm that the observed delivery could have been either a routine delivery (i.e., mail is dropped to the customer on every day that the delivery is

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covered) or a non-routine delivery caused by a particular service (i.e., parcel, accountable, hardship). If that is incorrect, please explain fully.

RESPONSE:

- (a) No such assumptions can be made. In most cases the receptacle associated with a central delivery type could be a central inside or central outside type mailbox. There are rare occasions where another type of receptacle is associated with a central type delivery.

Please refer to my response in ADVO/USPS-T13-71 for additional information.

- (b) There are seven load time tallies where a #1 box is associated with a central delivery type. There is one load time tally where a #1-1/2 box is associated with a central delivery type. There is one load time tally where a 1 handed slot is associated with a central delivery type. There is one load time tally where a 2-handed slot is associated with a central delivery type. There are three load time tallies where a flat receptacle is associated with a central delivery type. There are four load time tallies where a gang box is associated with a central delivery type. There are a total of seventeen load time tallies, out of 4017 tallies, where the receptacle is not a central inside or central outside. The seventeen tallies represent 0.42 percent of the total central delivery type load time tallies.

There are 2986 load time tallies where the receptacle is a central outside type and is associated with a central delivery type. There are 1014 load time

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tallies where the receptacle is a central inside type and is associated with a central delivery type.

Please refer to my response in ADVO/USPS-T13-71 for additional information.

- (c) No such assumptions can be made. One example would be occasions where the customer will stop by the mailbox as the carrier is loading the mail and the carrier will hand or "drop" the mail to the customer. On other occasions the "drop" is part of the routine central delivery.
- (d) No such assumptions can be made. One example would be occasions where the customer will stop by the mailbox as the carrier is loading the mail and the carrier will hand or "drop" the mail to the customer. On other occasions the "drop" is part of the routine dismount delivery.
- (e) Correct. The "Drop to Cust" code is intended to be used when the carrier was handing the mail to the customer or placing the mail on the customers' counter or reception area. On other occasions events occurred where a drop took place inside the customers screen door or many other areas that were designated for a "drop".
- (f) Confirmed. A "Drop to Cust" can take place on all delivery types for reasons mentioned earlier.
- (g) Confirmed. A "Drop to Cust" can take on all deliveries, routine or non-routine, for reasons mentioned earlier.

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ADVO/USPS-T13-141. Please refer to your response to ADVO/USPS-T13-81 describing in more detail the Level 11.2 Delivery Type and Level 11.3 Delivery Type Status Codes. If a carrier made a non-routine delivery, for example he had to dismount to drop a parcel when the delivery point was routinely served by curblane, would the observer record the delivery type as curblane or dismount?

RESPONSE:

Please refer to my response to ADVO/USPS-T13-104.

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ADVO/USPS-T13-142. Please refer to your response to ADVO/USPS-T13-81 describing in more detail the Level 11.2 Delivery Type and Level 11.3 Delivery Type Status Codes. There you state that the "11.2 and 11.3 levels could be N/A if the carrier's travel path was returning to unit, moving the vehicle to load, loading at the unit, traveling to lunch, or to other places where the carrier is not associated with a delivery type."

- (a) Please explain why there would be a N/A delivery type associated with a physical delivery to a mail receptacle or customer.
- (b) Please explain why there would be a N/A delivery type status associated with a physical delivery to a mail receptacle or customer.

RESPONSE:

- (a) I can find only one occurrence, out of the 39064 tallies in LR-I-163, where the data collector recorded a "N/A" in the "Delivery Type" column, the "Delivery Type Status" column contains "Resident Inside" and the activity detail of "Central Inside". I cannot explain why in this one case the data collector did not record the "Delivery Type". The STS category of load time is still applicable because the definition of load time is applied across all delivery types.
- (b) I find thirty-three tallies of the 39046 in LR-I-163, where the activity detail contains a mail receptacle. Thirty of the tallies have a location of "Point of Deliver". The activity level for the thirty tallies contains "Del/Coll", "Accountable" or "Finger @ Deliver". In all thirty tallies the location, activity and activity detail are consistent with the load time definition. One of the remaining three tallies contains "Drop to Cust" in the activity detail level. Again this is consistent with the load time definition. Of the two remaining tallies one tally records the carrier location as "On Route". The activity is

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"Del/Coll" and the activity detail is "# 1 Box". This tally is consistent with the load time definition. The final tally records the carriers' location as at a "Collection Box". The activity is "Del/Coll" and the activity detail is "Central Outside". This tally is consistent with the "Collection Time" definition. I cannot explain why in the thirty-three cases the data collector did not record the "Delivery Type Status". The STS categories of load time and collection time are still applicable because the STS definition is applied across all delivery type status.

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ADVO/USPS-T13-143. Please refer to your responses to UPS/USPS-T13-7 and ADVO/USPS-T13-76. The tally in the UPS question is:

CY50	8735	Vehicle	12:26	Dismount	Business Inside	Parcel	Drop to Customer
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- (a) Please confirm that, to prepare your response to both questions, you had to identify the date of the tally in question from the LR I-163 database and then pull hardcopy documents from your Merrifield, VA, depository.
- (b) Please confirm that the date for the tally you discuss in response to both questions is July 5, 1997.
- (c) Please confirm that the tally you have identified has the delivery status of "Resident Outside" while the UPS tally in question has the delivery status of "Business Inside."

RESPONSE:

- (a) Confirmed. The tally was identified in the LR I-163 database and also in the hardcopy documents at the Merrifield, VA depository.
- (b) Confirmed. The date for the tally in question, July 5, 1997, was confirmed using the documents stored at the Merrifield, VA location.
- (c) Confirmed. The delivery status "Resident Outside" not "Business Inside" was confirmed using the hardcopy documentation stored at the Merrifield, VA depository.

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**ADVO/USPS-T13-144. Please refer Attachment 1 to of your response to
ADVO/USPS-T13-76.**

- (a) Please confirm that this sheet is the one printed out by the data collector and mailed to the data processor. If this is incorrect, please identify the source of this particular sheet.**
- (b) Is the observation on the fourth row down the description of the tally (with Resident Outside as the Status) which is the subject of your responses? If it is not, please identify the correct row.**
- (c) Please confirm that in Attachment 1 there were (originally) two 12:20 PM Vehicle scans (one on the third row and one on the fourth row) and both were initialed, while there was only one 12:26 PM scan and that was for the Level 11.01 Personal or Administrative code on the fourth row. If you cannot, please explain why not.**
- (d) On the fourth row, the time associated with the Vehicle location scan (edited to be Point of Delivery) appears to be 12:20 PM, while the rest of the scans in that row appear to be scattered over several minutes, up to 12:28 PM. The location scan on the third row (directly above the fourth row) also has a 12:20 PM time.**
 - (i) Are these correct interpretations of what is on this sheet? If not, please explain what is occurring.**
 - (ii) Please explain why both the third and fourth row have the same scan time for the location code.**
 - (iii) Please explain why there are widely varying scan times for the fourth row observation.**
- (e) Please confirm that, although there are three apparent editor initials on rows three and four of this sheet, the editor did not make all the edits that you now consider appropriate.**

RESPONSE:

- (a) Confirmed.**
- (b) Confirmed.**
- (c) Confirmed.**

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- (d) (i) Not exactly. Underneath the "B" on the fourth line is an handwritten arrow indicating that the time should also be changed on the location scan.
 - (ii) The barcode scanning methodology allows the observer to scan the "11" level codes independent from the "10" level code. On very rare occasions when the carrier was at the same location when the "beep" sounded, the "11" level codes were all that would be required to complete the record.
 - (iii) On this particular scan sequence, the observer required over 1 minute to complete the scan.
- (e) Confirmed. The only edit the data coordinator did not complete is in the location column.

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ADVO/USPS-T13-145. Please refer to your responses to UPS/USPS-T13-7 and ADVO/USPS-T13-76. The tally in the UPS question is:

CY50	8735	Vehicle	12:26	Dismount	Business Inside	Parcel	Drop to Customer
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In your response, you state that the:

"USPS form 3999X (the 2nd attached page) shows the carrier dismounting to service 11 delivery points starting at 12:23 p.m. and ending at 12:30 p.m.

These two documents [including the 1st attached page] show that the carrier was not in the vehicle at 12:26 as the tally shows."

However, the form 3999X shows 14 possible delivery points recorded by the USPS on that sector-segment, and they are all identified as Residential Type 2 deliveries. You state in response to ADVO/USPS-T13-82 that Type 2 are residential curblane deliveries. Please confirm the following or explain why you cannot.

- (a) The routine delivery type on that sector-segment is residential curblane, a delivery type which does not routinely require a dismount.**
- (b) 12:23 PM is approximately the time the carrier began to service the curblane delivery points on that sector segment of the route being observed.**
- (c) 12:30 PM is approximately the time the carrier began to service the delivery point in the subsequent sector segment of the route being observed (also a residential curblane delivery) and does not necessarily represent the time that the carrier completed delivery to the preceding sector segment on the route.**
- (d) There appears to be a non-routine dismount during the sector-segment that begins 12:23 PM, and that non-routine dismount appears to be the sixth of 14 possible delivery points recorded by the USPS on that sector segment. The rest of the stops are curblane.**
- (e) There is no way from the Form 3999X to determine whether the carrier was in his vehicle, at his vehicle, out of his vehicle walking to the point of delivery, or at a delivery point at either 12:20 PM or 12:26 PM.**

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RESPONSE:

- (a) Not Exactly. In some cases a curblane delivery type can routinely require a dismount. The USPS form 3999X used by the observer shows a dismount took place. This is verified by the scan at 12:26 on the daily edit sheet. The information on the USPS form 3999X and other supporting documentation does not permit verification of the dismount as routine or not routine at this delivery point.
- (c) Confirmed.
- (d) Confirmed.
- (e) Not exactly. The USPS form 3999X and other supporting documentation does not permit verification of whether the dismount is routine or not routine at this delivery point.
- (f) Confirmed. Using only the USPS form 3999X there is no way to determine the location of the carrier. The information on the observer edit sheet places the carrier at the point of delivery at 12:26 and in the vehicle at 12:20. This is further supported by the activity detail scan of "Drop to Cust"(drop to customer) at 12:28.

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ADVO/USPS-T13-146. Please refer to the Form 3999X provided in response to ADVO/USPS-T13-76.

- (a) What do the handwritten 1.5 and 2 figures mean?
- (b) What does the handwritten "END 1767" mean?

RESPONSE:

- (a) The observers' handwritten numbers are the size of the rural boxes at the delivery point. The "1.5" represents a # 1-1/2 rural mailbox and the "2" represents a # 2 rural mailbox.
- (b) The observers' handwritten "End 1767" represents the observer ending a time study after that delivery. The "1767" is the unique serial number of the time study event.

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ADVO/USPS-T13-147. ADVO interrogatory ADVO/USPS-T13-86 asked questions about the flowchart presented in Appendix A to your testimony. In your response, you state: "It was not the intent of this flow process chart to identify the work sampling codes, but to define the boundaries of the time study groupings." Yet in responses to other ADVO interrogatories (e.g., ADVO/USPS-T13-93(b)), you claim that "the time studies have nothing to do with the work sampling that is the subject of my testimony." In light of these responses, please explain the relevance to your testimony of the Appendix A flow chart, and why it was included in your testimony.

RESPONSE:

Please refer to my response to ADVO/USPS-T13-111(a-d).

DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond
Date: 5-25-00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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May 25, 2000